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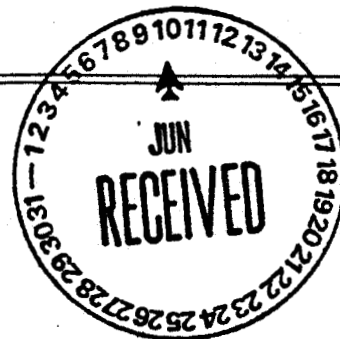
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June 2, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Draft Final No Further Action Justification (NFAJ) Document, OU16; March 1992

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division does not believe that the document is adequate or complete. In fact, the document is nothing more than copies of portions of previous IAG and Permit submittals that add nothing new to our knowledge of these IHSSs. There is no way for this document, in its present form, to justify no further action.

In order to establish whether no further action is justified at these IHSSs in OU 16, DOE must establish that there are no releases of hazardous waste (including hazardous constituents) from the IHSSs which pose a threat to human health or the environment. The Division refers DOE to Attachment A to this correspondence outlining the Clean Closure requirements applied by the Division. The Division expects from DOE a complete Final NFAJ Document by July 30, 1992 which either demonstrates that the OU 16 IHSSs meet Clean Closure requirements and need no further action or proposes that further action is necessary. If further action is necessary in any of the OU 16 IHSSs, a sampling plan for those IHSSs should be included in the final NFAJ document.

If you have any questions regarding these matters, please call John Reschl of my staff at 331-4803.

Sincerely,

Gary W. Badgman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Bob Birk, DOE
Lee Sobchak, EG&G
Farrel Hobbs, EG&G
Martin Hestmark, EPA
Barbara Barry, RFPD

ADMIN RECORD

A-OU16-000007